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/as

Attorney for Plaintiff

UNITED STATES DISTRICT COURT

EASTERN DISTRICT OF CALIFORNIA

NORA QUICHO,

Plaintiff,

v.

MARTIN O'MALLEY,¹

Commissioner of Social Security,

Defendant.

) Case No. 2:23-cv-02785-WBS-CKD

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Plaintiff and Defendant, through their respective attorneys, hereby stipulate that

Plaintiff shall have a sixty (60) day extension of time until June 4, 2024, in which to e-file her

Motion for Summary Judgment which is currently due on April 5, 2024. Defendant shall file any

¹ Martin O'Malley became the Commissioner of Social Security on December 20, 2023.

Pursuant to Rule 25(d)(1) of the Federal Rules of Civil Procedure, Martin O'Malley should be substituted for Kilolo Kijakazi as Defendant in this suit. No further action need be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

opposition, including cross-motion, on or before July 5, 2024. First, this second extension is necessitated due to the number of cases Plaintiff's counsel must brief for this court and the Ninth Circuit Court of Appeals. Second, the Certified Administrative Record contains approximately 10,000 pages, requiring significant additional time beyond the norm. Third, Plaintiff's counsel will be away from May 3, 2024 to May 17, 2024. Plaintiff makes this request in good faith with no intention to unduly delay the proceedings. Defendant has no objection and has stipulated to the requested relief.

Dated: March 28, 2024

/s/HARVEY P. SACKETT

HARVEY P. SACKETT
Attorney for Plaintiff
NORA QUICHO

Dated: March 28, 2024

/s/JUSTIN LANE MARTIN

JUSTIN LANE MARTIN
Special Assistant U.S. Attorney
Social Security Administration
[*As authorized by email 3/28/24]

IT IS ORDERED.

Dated: April 1, 2024



CAROLYN K. DELANEY
UNITED STATES MAGISTRATE JUDGE